

To: Beeler, Cindy[Beeler.Cindy@epa.gov]
From: Smith, Claudia
Sent: Wed 4/20/2016 4:04:34 PM
Subject: U&O FIP - Consistent Terminology w/ Source Determination and IC FIP

OAQPS and OGC commented that we should be using consistent terminology with the national oil and gas rules, in particular calling the affected operations sources instead of facilities. We had originally been trying to stay sensitive of not going out ahead of the source determination rule by using the word facility instead of source, but since it is looking like that rule and the national IC FIP will go final before we propose, they want us to be consistent. The draft final national oil and natural gas Indian country FIP for new true minor sources contains a definition for "oil and natural gas source," which was changed from the proposed "oil and natural gas production facility," for the same reasons they want us to change our terminology (consistency with source determination rule and permitting terms). Additionally, the national FIP is now also covering true minor sources in the natural gas processing segment in response to comments received. The definition in that draft final FIP was nearly identical to our "oil and natural gas production facility" definition, so, I decided to just use that same term and definition and cover the same two segments (production and natural gas processing) for the U&O existing source FIP. Essentially, although we believe most of the sources affected by the U&O FIP will be minor sources in the production segment, there may be existing minor or major sources in the production and natural gas processing segments that are not controlling the emissions units we are proposing to regulate, so we would not want to limit it to minor sources in the production segment, especially since this is not a rule replacing permitting.

Does that make any sense?

Claudia

From: Beeler, Cindy
Sent: Wednesday, April 20, 2016 9:46 AM
To: Smith, Claudia <Smith.Claudia@epa.gov>
Subject: RE: Thank You: SAN 5872 - Region 8 FIP for Existing Oil and Natural Gas Sources; U&O Indian Reservation in Utah

Really good job on this, Claudia. Reading the transmittal email below where you've tracked all the various ORA reviewers gives an idea of the amount of coordination,

organization and logistics you've been handling – amazing!

What's the story behind the new name of the rule? What is the new name?

Cindy Beeler

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From: Smith, Claudia

Sent: Wednesday, April 20, 2016 8:42 AM

To: Ostendorf, Jody <ostendorf.jody@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>; Gilbert, Alexas <Gilbert.Alexas@epa.gov>; Siffring, Stuart <Siffring.Stuart@epa.gov>; Okubo, Noreen <Okubo.Noreen@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Tonnesen, Gail <Tonnesen.Gail@epa.gov>; Varilek, Kimberly <Varilek.Kimberly@epa.gov>; Matsumoto, Kimi <Matsumoto.Kimi@epa.gov>; Stoneman, Chris <Stoneman.Chris@epa.gov>; Wells, Benjamin <Wells.Benjamin@epa.gov>; Vetter, Cheryl <Vetter.Cheryl@epa.gov>; Moore, Bruce <Moore.Bruce@epa.gov>; Howard, Jodi <Howard.Jodi@epa.gov>; Spells, Charlene <Spells.Charlene@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>

Subject: Thank You: SAN 5872 - Region 8 FIP for Existing Oil and Natural Gas Sources; U&O Indian Reservation in Utah

All,

I just wanted to let you all know that the proposed FIP for existing oil and natural gas sources on the U&O Reservation went to OAR yesterday for review and transmittal to OMB. It was truly a colossal and quick team effort and I want to thank all of you for your help in making it happen. It would not have been possible without your support!

Thanks again,

Claudia

From: Smith, Claudia

Sent: Tuesday, April 19, 2016 4:35 PM

To: Cyran, Carissa <Cyran.Carissa@epa.gov>

Cc: Henigin, Mary <Henigin.Mary@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>; Boydston, Michael <Boydston.Michael@epa.gov>; Sutin, Elyana <Sutin.Elyana@epa.gov>; Morales, Monica <Morales.Monica@epa.gov>; Green, Gregory <Green.Gregory@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>; Ostendorf, Jody <ostendorf.jody@epa.gov>

Subject: SAN 5872 - Region 8 FIP for Existing Oil and Natural Gas Sources; U&O Indian Reservation in Utah

Carissa,

Here is the proposed action for OAR's review, concurrence, and transmission to the Office of Policy for OMB review. OGC has concurred, as you can see in the attached email from Elliott Zenick below. Included are drafts of the NPRM, action memo, and fact sheet, revised versions from those sent on March 24th by Regina Chappell, as a result of OGC comments (including a change to the title of the proposed rule, which has been updated in ADP Tracker). Also included is the previously submitted OMB transmittal memo signed by the Region 8 Administrator. Please note that the OMB transmittal memo contains the earlier title of the proposed rule and has not been updated with revised nuances based on OGC comments. Let me know if you will need an updated OMB transmittal memo signed by the RA.

Below is a list of the names of everyone who has reviewed the NPRM. Janet McCabe provided a preliminary review and comments back in January. I have attached an earlier version of the NPRM that shows how we addressed Janet's preliminary comments. Much of the NPRM has been revised since then, so a document compare with the attached clean version would likely be very messy and not very helpful.

Bruce Moore, OAQPS

Jodi Howard, OAQPS

Charlene Spells, OAQPS

Greg Nizich, OAQPS

Chris Stoneman, OAQPS

Benjamin Wells, OAQPS

Alex McPherson, OAQPS

Cheryl Vetter, OAQPS

Geri Garwood, OAQPS

Laura Mckelvey, OAQPS

Mike Koerber, OAQPS

Jan Gilbreath, OP

Rick Vetter, OGC

Tod Siegel, OGC

Amy Branning, OGC

Elliott Zenick, OGC

Joe Goffman, OAR

Debbie Jordan, OAR

Please let me know if you need anything else to move this action forward.

Thanks,

Claudia

From: Zenick, Elliott
Sent: Tuesday, April 19, 2016 12:30 PM
To: Boydston, Michael <Boydston.Michael@epa.gov>
Cc: Smith, Claudia <Smith.Claudia@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>;
Sutin, Elyana <Sutin.Elyana@epa.gov>
Subject: RE: UO FIP -- revised version for EZ review

I had one last change, which Claudia has made. Go ahead and send to Janet.

From: Boydston, Michael
Sent: Tuesday, April 19, 2016 12:53 PM
To: Zenick, Elliott <Zenick.Elliott@epa.gov>
Cc: Smith, Claudia <Smith.Claudia@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>;
Sutin, Elyana <Sutin.Elyana@epa.gov>
Subject: UO FIP -- revised version for EZ review

Hi Elliott –

Thanks again for looking at this. As discussed in our exchange of voice mails, attached is a cleaned-up version of the FIP that leaves your most recent comments and Claudia's responses so that you can quickly assess things. It's also on Sharepoint; if you need to make edits, Sharepoint would be the preferred approach, but if necessary feel free to edit this version and send back. But we hope that this addresses your comments sufficiently; if it does, would you let us know whether you concur? If you do, we'll send a cleaned-up version to OAR for Janet's review.

Thanks again for your help. (And my thanks to Claudia for doing all the work on this end.)

Mike